

1 Joseph R. Saveri (State Bar No. 130064)
jsaveri@lchb.com
2 Eric B. Fastiff (State Bar No. 182260)
efastiff@lchb.com
3 Brendan Glackin (State Bar No. 199643)
bglackin@lchb.com
4 LIEFF, CABRASER, HEIMANN
& BERNSTEIN, LLP
5 275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
6 Telephone: (415) 956-1000
Facsimile: (415) 956-1008
7

8 *Attorneys for Individual and Representative Plaintiff*
9 *Rochester Drug Co-Operative, Inc.*

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 (OAKLAND DIVISION)

13 MEIJER, INC. & MEIJER
14 DISTRIBUTION, INC., on behalf of
15 themselves and all others similarly
situated,

16 Plaintiffs,

17 v.

18 ABBOTT LABORATORIES,

19 Defendant.

Case No. C 07-5985 CW

**EX PARTE APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

20 ROCHESTER DRUG CO-
21 OPERATIVE, INC., on behalf of itself
22 and all others similarly situated,

23 Plaintiff,

24 v.

25 ABBOTT LABORATORIES,

26 Defendant.

Case No. C 07-6010 CW

**EX PARTE APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

27 --[caption continues next page]--
28

LOUISIANA WHOLESALE DRUG
COMPANY, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

ABBOTT LABORATORIES,

Defendant.

Case No. C 07-6118 CW

**EX PARTE APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

The Direct Purchaser Class Plaintiffs, by and through their counsel, respectfully ask the Court, on an *ex parte* basis, for an order permitting them to file under seal:

- Direct Purchaser Class Plaintiffs' Notice of Motion and Motion for Class Certification (the "Motion");
- Class Certification Declaration of Hal Singer, Ph.D. (the "Declaration").

Plaintiffs request that the Declaration be filed under seal in its entirety pursuant to Local Rule 79-5(d) because it pervasively refers to documents that defendant Abbott Laboratories has designated "confidential" pursuant to the protective order. Plaintiffs request that the Motion be sealed in part, to the extent it refers to the Declaration. Plaintiffs have lodged with the court the Motion, a redacted Motion, and the Declaration in accordance with Local Rule 79-5(d).

Dated: May 5, 2008

Respectfully submitted,

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

By: /s/Brendan Glackin

Joseph R. Saveri (State Bar No. 130064)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

*Attorneys for Individual and Representative Plaintiff
Rochester Drug Co-Operative, Inc.*